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American Honda Motor Co. Inc.
7

8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10

11 BILL SCHEPLER and ADRIAN
12 GARCIA, individually and on behalf of)
13 all others similarly situated,)

14 Plaintiff,)

15 vs.)

16 AMERICAN HONDA MOTOR CO.,)
17 INC.,)

18 Defendant.)
19)
20)
21)
22)
23)
24)
25)
26)
27)
28)

Case No. 2:18-CV-6043-GW-AFM

Assigned to: Hon. George H. Wu

**STIPULATION TO STAY CLASS
CERTIFICATION DEADLINES FOR
ONE MONTH**

Third Amended Complaint Filed: August
9, 2019

1 In light of the current public health crisis relating to the coronavirus pandemic¹,
 2 Plaintiffs Bill Schepler and Adrian Garcia (“Plaintiffs”) and Defendant American
 3 Honda Motor Co., Inc., (“AHM”) (collectively “Parties”) in the above-captioned
 4 matters stipulate and agree as follows:

5 WHEREAS pursuant to the Court’s October 11, 2019 Order (Dkt. # 72),
 6 Plaintiffs filed their motion for class certification on March 9, 2020, including three
 7 expert reports;

8 WHEREAS per the Court’s October 11, 2019 order, the remaining
 9 briefing/hearing schedule for Plaintiffs’ motion for class certification is as follows:

- 10 • **April 8, 2020:** Deadline for AHM to file its Opposition to Plaintiffs’
 11 Motion for Class Certification and Expert Reports.
- 12 • **April 29, 2020:** Deadline for Plaintiffs to file Reply ISO Motion for
 13 Class Certification.
- 14 • **May 11, 2020:** Hearing on Plaintiffs’ Motion for Class Certification.

15 WHEREAS during this time, both parties expect to take expert depositions,
 16 which would require travel, and may require attendees to sit in close quarters during
 17 the depositions;

18 WHEREAS, due to office closures, including AHM’s outside counsel’s office,
 19 school closures, and other impacts of the virus on daily life, the ability of many of the
 20 experts, staff, and attorneys involved in this action to devote the necessary resources
 21 to this case has been compromised;

22 WHEREAS the parties met and conferred and agreed for the health and safety
 23 of everyone involved in this case, subject to Court approval, to stay the class
 24 certification deadlines for one month;

25 WHEREAS the parties further agree, subject to Court approval, that, on or

26
 27 ¹ On March 11, 2020 the World Health Organization declared the coronavirus
 28 (COVID-19) a global pandemic. (<https://www.who.int/dg/speeches/detail/who-director-general-s-opening-remarks-at-the-media-briefing-on-covid-19---11-march-2020>)

1 before April 13, 2020, the parties will file a stipulation with a proposed revised
2 briefing schedule.

3 IT IS HEREBY STIPULATED by and between the parties, through their
4 respective undersigned counsel, and subject to Court approval, to stay class
5 certification deadlines for one month and to submit a proposed revised briefing
6 schedule to the Court on or before April 13, 2020.

7
8 Dated: March 16, 2020

Respectfully submitted,

9 /s/ Rachel A. Straus

10 Michael L. Mallow

Rachel A. Straus

11 SHOOK, HARDY & BACON LLP

12 *Attorneys for Defendant American*
13 *Honda Motor Co. Inc.*

14 Dated: March 16, 2020

Respectfully submitted,

15 /s/Kolin Tang

16 James C. Shah

Kolin Tang

17 SHEPHERD, FINKELMAN, MILLER
& SHAH, LLP

18 Robert W. Murphy

MURPHY LAW FIRM

19 Ryan R. Frasher

20 THE FRASHER LAW FIRM PC

21 *Attorneys for Plaintiffs and the*
22 *Proposed Class*

23 **SO ORDERED:**

24 DATED: _____

25 Honorable George H. Wu

26 United States District Court Judge